

**Maine
AFCARS
Assessment Review
Report**

February 2006

**Prepared by:
Children's Bureau, Administration on Children, Youth and Families
and
Office of Information Services
Administration for Children and Families
U.S. Department of Health and Human Services**

THIS PAGE INTENTIONALLY LEFT BLANK

Executive Summary

From September 12 - 16, 2005, staff of the Children's Bureau, Administration for Children and Families (ACF) Region I, and the Office of Information Services (OIS) conducted an assessment review of Maine's Adoption and Foster Care Analysis and Reporting System (AFCARS) data collection in the Maine Automated Child Welfare Information System (MACWIS). The AFCARS data used for the review was from the report period October 1, 2004 - March 31, 2005 (2005A).

Two major areas are evaluated as part of an AFCARS assessment review (AAR): the AFCARS general requirements and data elements. The general requirements include the population that is to be reported to AFCARS and the technical requirements for constructing a data file. The data elements are assessed on the basis of whether the State is meeting the AFCARS definitions for the information required, if the correct data are being entered and extracted, and the quality of the data submitted. Each of the 103 foster care and adoption data elements is rated on the basis of its compliance with the requirements in the AFCARS regulation, policy guidance, and technical bulletins. Information that is collected from each of the components of the review is combined to rate each data element. A scale of one (does not meet AFCARS standards) to four (fully meets AFCARS standards) is used to assign a factor to each element. The general information requirements are also assessed and rated separately using the same scale. A summary of the significant findings is included in the report, and detailed findings can be found in the "Detailed Findings" matrices for the foster care and adoption data elements, and the general requirements (Tab A). The minimum tasks that are required to correct the State's reporting of the AFCARS data are included in the AFCARS Improvement Plan (Tab B). The rating factors received by the State are:

General Requirements	Rating Factor
Foster Care/Adoption Population Standards	2
Technical Standards	2

Rating Factor	Foster Care (66)	Adoption (37)	Total (103)
4	18 (27%)	21 (57%)	39 (38%)
3	22 (33%)	1 (.027)	23 (22%)
2	26 (39%)	15 (41%)	41 (40%)
1	0	0	0

In regard to the general requirements, the State's reporting of the adoption population is correct, but there were two errors in the foster care reporting population. One relates to children returned home while in the agency's responsibility for care and placement. The State correctly includes these children in the AFCARS reporting population, but the system does not account for specified or non-specified periods of time. The State must modify the collection and reporting of this information to ensure that if the child is returned home for a specified period of time, regardless of the length of time, these children continue to be included in AFCARS for the entire specified period of time. If there is not a specified period of time noted, and if the child is still at home and the agency has care and placement responsibility after six months, the child is to be reported in AFCARS as "discharged."

The second issue with the State's foster care population relates to the reporting of youth who have reached the age of majority. The State provides services to youth through a voluntary arrangement after the age of 18, regardless of eligibility for title IV-E funds. For youth 18 or older that are not receiving title IV-E funds, the State must report these individuals as discharged. The reason for discharge would be "emancipation," unless there is another appropriate outcome reason.

In regard to the technical standards, the most significant issue relates to the State's ability to create a "subsequent" data file. The State staff noted that if they do a resubmission of a prior report period, some of the data may be "overwritten." This means that instead of reporting data reflecting the case during the prior report period, only data from the present timeframe would be submitted. While this is primarily a database design issue, it results in incorrect data being reported for prior report periods. The State's statewide automated child welfare information system (SACWIS) should be designed as the State's electronic case file and, as such, contain the full history of events that occur for each involvement with the child welfare system.

In general, the two most significant areas requiring technical corrections are in the areas of case plan goal (foster care element #43) and placement information (foster care elements #23, #24, and #41). The State acknowledged issues with the case plan module of its information system and with issues related to practice. The staff indicated that as part of the Child and Family Services Program (CFSR) Improvement Plan they have been working on improving the definitions for case plan goals. The Federal team provided suggestions, in addition to the required changes needed, for improving the design of the screens collecting this information.

In regard to the placement information, the State identified an error in the way the program code handles the counting of placements. The program code was also including all services provided by a provider. There are also some placements that are incorrectly mapped to AFCARS values.

The State needs to address its collection and reporting of whether a child is diagnosed with a disability. According to the frequency report, 76% of the records reflect that the child has not been seen by a medical professional. This contradicts the findings in the State's CFSR, in which the "physical health of the child" was rated a strength. It appears, based on the case file review, that the children are being seen by a medical professional, but the data are not being entered in the information system.

Many of the other technical corrections needed for the foster care elements relate to correcting the mapping of a State value to the correct AFCARS value. In other instances, the State is including values that are no longer used and should be removed from the program code and the screen selection list.

Changes made to the system with regard to data entry will inevitably result in improved data accuracy and quality. The State's semi-annual data submission may, as a result, fail to meet the missing data standard. In order to ensure that the data are complete, the agency must require workers to enter the data and assess its validity prior to submitting it to the Administration for Children and Families (ACF). To do so, the State may utilize the management reports created by the agency, as well as the Data Quality Utility and the Frequency Utility issued by ACF. It is

important that the AFCARS data accurately reflect the circumstances of children in foster care and under the agency's responsibility.

Tab B contains the AFCARS Improvement Plan (AIP). The AIP contains the AFCARS data elements that do not meet the requirements in the Federal regulations. Each matrix contains a column that identifies the task(s), the date the task is to be completed, and one for comments.

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff must submit the Improvement Plan electronically to the ACF Regional Office, OIS, and the Children's Bureau with estimated due dates for completing the tasks in the Improvement Plan.

The State should contact the ACF Regional Office once it has completed its AIP. The ACF Regional Office will then provide the State with a set of test case scenarios. These scenarios test the system by requiring the State to enter the information and extract the data, which is then compared to known answers for each scenario. Dates for the submission of the test data file will be arranged with the ACF Regional Office and the Office of Information Systems.

In order to assess the quality of the data, a frequency report will be generated on the data submitted after the system changes have been implemented. Once ACF and the State agree that the quality of the data is acceptable, and that all tasks and revisions based on the test cases have been completed, the State must submit the completed AIP to the ACF Regional Office. The State will receive a letter summarizing the final results of the review.

The ACF Regional Office will work with the State to determine if technical assistance is needed, and available, to implement the AFCARS Improvement Plan. The State may obtain technical assistance from the Children's Bureau's resource centers. To request technical assistance from the resource centers, contact your ACF Regional Office.

THIS PAGE INTENTIONALLY LEFT BLANK

TABLE OF CONTENTS

Background	1
Rating Factors	1
Findings	3
General Requirement Standards	3
Data Elements	4
Conclusion	6
Tab A Detailed Findings	
Section 1: General Requirements	
Section 2: Foster Care and Adoption Elements	
Section 3: Case Files	
Tab B AFCARS Improvement Plan	
Section 1: General Requirements	
Section 2: Foster Care and Adoption Elements	

THIS PAGE INTENTIONALLY LEFT BLANK

BACKGROUND

The Children's Bureau is committed to assisting States collect reliable and accurate data from the Adoption and Foster Care Analysis and Reporting System (AFCARS). To this end, an AFCARS assessment review (AAR) process was developed. The State's information system is assessed against the AFCARS requirements in the Federal regulation and policy issuances. The AFCARS assessment review evaluates a State's information system's capability to collect, extract, and transmit the AFCARS data accurately to the Administration for Children and Families (ACF). A second focus of the AFCARS review is to assess the accuracy of the collection and documentation of information related to the foster care and/or adoption case of a child.

The review process goes beyond the edit checks that must be met by a State in order to pass the AFCARS compliance error standards. The review also ascertains the extent to which a State meets all of the AFCARS requirements and the quality of its data. Additionally, while the review is an assessment of the State agency's collection and reporting of AFCARS data, it is also an opportunity for Federal staff to provide substantive technical assistance to State agency staff. During the review, the Federal team identifies improvements to be made to the system and recommends changes to the program code used to extract the AFCARS data.

Each AAR consists of a thorough analysis of the State's system technical documentation for the collection, extraction and reporting of the AFCARS data. In addition to this review of documentation, the Federal AFCARS team reviews each data element with the State team to gain a better understanding of the State's child welfare practice and policy and State staff's understanding of the data elements. The data is also compared against a small, randomly selected number of hard copy case files. Through this exercise, the accuracy of the State's data conversion process and understanding of the information reported to AFCARS is tested.

RATING FACTORS

Two major areas are evaluated during an AFCARS assessment review: the AFCARS general requirements, and the data elements. The general requirements include the population that is to be reported to AFCARS and the technical requirements for constructing a data file. The data elements are assessed to determine whether the State is meeting the AFCARS definitions for the information required, if the correct data is being entered and extracted, and the quality of the data submitted.

AFCARS data submissions are subject to a minimal number of edit checks, as listed in Appendix E of 45 CFR Part 1355. Based on these edit checks, substantial compliance can be determined for the timely submission of the data files, the timeliness of data entry of certain data elements, and whether the data meets a 90% level of tolerance for missing data and internal consistency checks. However, "substantial" compliance does not mean a State has fully implemented the requirements in the regulations. This explains why a State formerly may have been penalty-free, but does not have accurate and reliable quality data. For example, data cannot be assessed to determine whether the State submitted the correct foster care population required by the regulations.

Information collected from each component of the assessment review is used to rate each data element. The general requirements are assessed and rated separately using the same scale. A scale of one (does not meet the AFCARS standards) to four (fully meets the AFCARS standards) is used to assign a rating factor. Below is a chart that lists the factors that were used for the analysis of the State's AFCARS.

RATING FACTOR	DEFINITION
1	<p>The AFCARS requirement(s) has not been implemented in the information system. For example:</p> <ul style="list-style-type: none"> • The State information system does not have the capability to collect the correct information (i.e., there is no data field on the screens). • There is no program logic to extract the data.
2	<p>The technical system requirements for AFCARS reporting do not fully meet the standards. For example:</p> <ul style="list-style-type: none"> • The State information system has the capability (screen) to collect the data, but the program logic is incorrect - - <ul style="list-style-type: none"> • The State uses defaults for blank information. • Information is coming from the wrong place on the system. • Information is located in the wrong place on the system, i.e., it should be in foster care screens, not adoption screens. • The system needs modification to encompass more conditions, e.g., disability information.
3	<p>The technical system requirements for AFCARS reporting are in place, but there are data entry problems affecting the quality of the data.</p> <ul style="list-style-type: none"> • The system functions as required, but-- <ul style="list-style-type: none"> • the data are underreported due to inconsistent data entry. • the data are not being entered and/or there are no supervisory controls for ensuring data entry.
4	<p>All of the AFCARS requirements have been met. The information system is functioning as required, and the information is being accurately collected and extracted.</p>

For data elements and general requirements that do not meet existing AFCARS standards (factors 1 through 3), the State is required to make the corrections identified by the review team. It is possible that the problem with a data element and data are due to both system issues and case worker data entry issues. In such instances, the element will be rated a "2" to denote the need for modification to the system logic. Once the corrections are made to the system, the data will be re-analyzed. If problems related to case worker training or data entry still exist, then a "3" will be assigned to the requirement. A rating factor of "4" (compliant) will not be given to the element until all system issues and/or data quality issues have been addressed.

When assessing the general requirements, all specifications must be met in order for the item to fully satisfy the requirement. If the issue is a programming logic problem, then a "2" will be

assigned. If it appears the problem is due to data entry, then a “3” will be assigned to the requirement.

Some data elements are directly related to each other. When this occurs, all related elements are given the same rating factor because incorrect programming logic could affect the related data elements.

The State is required to make the changes to the information system and/or data entry in order to be compliant with the applicable requirements and standards. Since the AFCARS data are used for several significant activities at the Federal and State level, the State must implement the AFCARS Improvement Plan, under Tab B of this report, as a way to improve the quality of its data.

FINDINGS

This section provides the major findings resulting from the review of the State’s AFCARS data collection. Tab A provides detailed information on the findings for the general AFCARS requirements, each of the foster care and adoption data elements, and the case file review. The AFCARS data used for the review were from the report period October 1, 2004 - March 31, 2005.

As part of the post-site visit analysis, the State’s documents, the data, the case file review findings, and team member notes were assessed to make the final determination of findings. As a result, the original rating factors were modified from those given at the end of the on-site review. The findings matrix in Tab A reports the previous rating with a “strike-through” mark on it, and the new rating. The AFCARS Improvement Plan in Tab B contains the final rating factor.

General Requirement Standards

Population Standards

The State’s reporting of the adoption population is correct, but there were two errors in the foster care reporting population. The State does return children to their own home while the agency retains responsibility for care and placement, and correctly includes these children in the AFCARS reporting population. However, judges may order children home for both specified and non-specified periods of time and the program code, or the system, does not account for either specified or non-specified periods of time. The State must modify the collection and reporting of this information to ensure that if the child is returned home for a specified period of time, regardless of the length of time, these children continue to be included in AFCARS for the entire specified period of time. If there is not a specified period of time noted, and if the child is still at home and the agency has care and placement responsibility after six months, the child is to be reported in AFCARS as “discharged.”

The second issue with the States foster care population relates to the reporting of youth who have reached the age of majority. In Maine, the age of majority is 18. The State does claim title IV-E

funds for youth up to their 19th birthday if the individual meets the title IV-E requirements, and is correctly including them in the AFCARS report. The State also provides services to youth through a voluntary arrangement after the age of 18, regardless of eligibility for title IV-E funds. The State incorrectly includes these youth in AFCARS. Once a child reaches 18, or 19, if appropriate, the State must report these individuals as discharged. The reason for discharge would be “emancipation,” unless there is another appropriate outcome reason.

Technical Requirements

One of the AFCARS requirements is: “The data must be extracted from the data system as of the last day of the reporting period” (45 CFR 1355.40(b)(1)). While the original intent of AFCARS reporting was based on States submitting data files only once for each report period, this has turned out not to be the case. States often make corrections, such as entering data that was missing or correcting inaccurate data, and then re-submit the data file. The Children’s Bureau acknowledged this by allowing States to submit data files for prior report periods, without a restriction on the number of times a report period can be submitted. To account for multiple types of submissions, the Children’s Bureau modified the naming convention for files. There are two file types: a regular file (R) and a subsequent file (S). A regular file is defined as: “An AFCARS State data file for a current report period that is submitted during the appropriate transmission time frame, April 1- May 15 and October 1-November 14.” A subsequent file is defined as “Submissions that are received after the AFCARS due dates for a regular report (May 15 or November 14)” (AFCARS Technical Bulletin #2).

Prior to the AFCARS review and during the on-site review, the State identified that it had problems with re-submitting data for prior report periods. The State staff noted that if they do a resubmission of a prior report period, some of the data may be “overwritten.” This means that instead of reporting data reflecting the case during the prior report period, only data from the present timeframe would be submitted. While this is primarily a database design issue, it results in incorrect data being reported for prior report periods. The State’s statewide automated child welfare information system (SACWIS) should be designed as the State’s electronic case file, and as such, contain the full history of events that occur for each involvement with the child welfare system.

This problem is included as a general requirements error since it involves the creation of a file, storage of data, and affects both foster care and adoption. The element findings matrices includes information on which elements should always reflect the situation for any given report period.

Data Elements

The most significant problem area is the collection and reporting of case plan goals (foster care element #43). The State noted that they are aware of the issues related to the way the system collects this data. Also, this was an area noted as needing improvement during the State’s Child and Family Services Review. The State is addressing what is considered a case plan goal, how workers are to document the goal, and the systems method of collecting and reporting the data.

For more detailed information regarding the corrections needed in this area, see foster care element #43 in the foster care findings matrix.

Another significant area needing improvement is the information collected on whether a child was diagnosed as having a disability (foster care elements number 10 through 15). According to the frequency report for the 2005A data, 76% (2,408) of the records indicate a child has not been seen by a qualified professional. However, in Maine's CFSR, Item 22 (Physical Health of the Child) was rated as strength. This indicates that, overall, Maine's children in foster care are receiving appropriate medical screenings and services. The State needs to ensure that the AFCARS data reflects practice.

The design of the screens collecting information on whether a child has been clinically diagnosed with a disability may be contributing to the underreporting of this data and providing false "no" and "not yet determined" responses. There is not a specific field where the question "has this child been diagnosed with a disability" is asked along with the three AFCARS values "yes," "no," and "not yet determined." The State should modify the screens to include the question and develop a process to ensure that case workers enter this data in a timely manner and also update it when new information is obtained. Appropriate changes to the screens related to the disability and special needs elements and improved data entry should allow for a more accurate reflection of the services that are being provided.

The State needs to review and revise its collection and reporting of placement information. There are several codes that the program code checks for that are incorrectly mapped, or should not be included. After reviewing the review findings and the program code, there may be a need for follow-up discussions with the Federal team.

Also, as part of the system demonstration, the State had to enter a test case scenario. When the results of this case were extracted and compared to the expected answers, a significant problem was identified with the number of placement moves. The AFCARS answer was two moves, but the extract indicated 23. The State staff found the problem while the Federal team was on-site. The program code is counting the number of services provided to a child by those agencies that provide services in addition to placement. During the case file review, the reviewers found that the children had fewer placement moves than what was reported to AFCARS.

Many of the other technical corrections needed for the foster care elements relate to correcting the mapping of a State value to the correct AFCARS value. In other instances, the State is including values that are no longer used, and should be removed from the program code and the screen selection list.

In the case file review there were a number of errors found in the dates of first removal, the dates of latest removal, and the number of removal episodes. The majority of the errors were due to the reviewers finding earlier dates of removal than what were reported in the AFCARS data. There were also more removal episodes than what were reported, which also caused errors in the date of discharge from the previous removal episode. While there are some technical corrections that need to be made to these elements, the more significant problem relates to incomplete data entry of the historical information at the time of conversion from the legacy system to SACWIS.

The State is required to report the date of a child's first-ever removal from home and the total number of times a child has entered foster care. The State needs to review and clean up data regarding a child's prior experience with the foster care system.

There are elements in which the quality of the data needs to improve. There are foster care and adoption elements that require additional training and supervisory oversight for the timeliness and accuracy of data entry. A significant area that is underreported is the circumstances associated with a child's removal from home.

CONCLUSION

Tab B contains the AFCARS Improvement Plan (AIP). The AIP contains the AFCARS general requirements and the data elements that do not meet the requirements in the Federal regulations. Each matrix contains a column that identifies the finding(s), the task(s), the date the task is estimated to be completed, and one for comments.

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff must submit the Improvement Plan electronically to the ACF Regional Office with estimated due dates for completing the tasks in the Improvement Plan. An electronic copy of the final matrices will be e-mailed to your staff. The State should provide electronic quarterly updates of its progress to Christine Guthrie in the ACF Regional Office and Angelina Palmiero in the Children's Bureau.

Additionally, the State's plan for implementing the changes to the system and for caseworker training must be included in the State's title IV-B Annual Progress and Services Report as part of the information required in 45 CFR 1357.15(t) and 45 CFR 1357.16(a)(5). Once the State has completed the AIP, notify the ACF Regional Office. The ACF Regional Office will then provide the State with a set of test case scenarios. These scenarios test the system by requiring the State to enter the information and extract the data, which is then compared to known answers for each scenario. Dates for the submission of the test data file will be arranged with the ACF Regional Office and the Office of Information Systems.

In order to assess the quality of the data, a frequency report will be generated on the data submitted as changes to the system and training are addressed, and after all system changes and training are completed. Once ACF and the State agree that the quality of the data is acceptable, and all tasks and revisions based on the test cases have been completed, the State must submit the completed AIP to the ACF Regional Office. The State will receive a letter summarizing the final results of the review.

The ACF Regional Office will work with the State to determine if technical assistance is needed, and available, to implement the AFCARS Improvement Plan. The State may obtain technical assistance from the Children's Bureau's resource centers. To request technical assistance from the resource centers, contact your ACF Regional Office.